

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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UNITED STATES OF AMERICA

SEP 30 AM 10:29

VS.

Crim. No. 04-30046-MAP

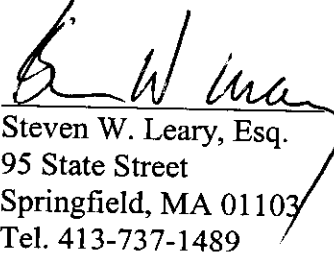
U.S. DISTRICT COURT
DISTRICT OF MASS.

ALBERT INNARELLI, ET AL,
DEFENDANTS

MOTION OF DEFENDANT MICHAEL BERGDOLL
TO MODIFY CONDITIONS OF RELEASE

Now comes the defendant Michael Bergdoll and requests that the Court modify the conditions of his release imposed on September 23, 2004 by permitting him to travel outside of the Commonwealth of Massachusetts on October 15, 2004. In support of this motion the defendant says that his two young sons and three of their friends have tickets to attend a concert by the artist known as "Usher". The performance will occur in Hartford, CT on the evening of October 15, 2004. The defendant has agreed, subject to the Court's approval, to provide transportation and supervision for his sons and their friends at this concert. Counsel for the defendant has conferred with AUSA William Welch and Mr. Welch does not oppose this motion.

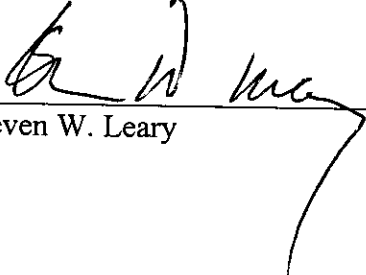
The Defendant
Michael Bergdoll
By his attorney


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CERTIFICATE OF SERVICE

I, Steven W. Leary, Esquire, counsel of record, hereby certify that I made service of the foregoing document by mailing a copy of same, postage prepaid, to all attorneys of record.

September 29, 2004



Steven W. Leary